

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DESHANTA BREWSTER

Plaintiff,

Case No. 2:22-cv-12220
Hon. Matthew F. Leitman

v.

MISSION POINT MANAGEMENT
SERVICES, LLC,

Defendant.

**DEFENDANT MISSION POINT MANAGEMENT
SERVICES, LLC'S PRE-TRIAL DISCLOSURES**

Defendant, Mission Point Management Services, LLC ("Mission Point"), by and through its counsel, Fisher & Phillips LLP, submits the following pre-trial disclosure pursuant to Federal Rule of Civil Procedure 26(a)(3):

- i. Witnesses Defendant expects to call at trial:
 1. Plaintiff, DeShanta Brewster. Ms. Brewster may be contacted through defense counsel.
 2. Sue Kubiak, Payroll Specialist for Defendant. Ms. Kubiak may be contacted through defense counsel.
 3. Sarah Buchanan. Vice President of Human Resources for Defendant. Ms. Buchanan may be contacted through defense counsel.
- ii. Witnesses expected to be presented by deposition:

1. Defendant does not expect to present witness testimony by deposition at trial.
- iii. Exhibits expected to be presented at trial:
 1. Plaintiff's personnel file.
 2. Documentation of Plaintiff's job duties
 3. Plaintiff's payroll file.
 4. Payroll files of opt-in class members.
 - iv. Rule 26(a)(1)(A)(iii) damages disclosure:
 1. Defendant maintains that Plaintiff has not suffered any damages.
 - v. Rule 26(a)(1)(A)(iv) insurance disclosure:
 1. Defendant maintains a policy providing employment practices liability insurance under which coverage may extend to satisfy a portion of a possible judgment.
 - vi. Rule 26(a)2) disclosure:
 1. Defendant does not anticipate the use of expert testimony at trial in this matter.

Respectfully Submitted,

FISHER & PHILLIPS LLP

By: /s/ William E. Altman _____

William E. Altman (P52788)

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Attorneys for Mission Point Management
Services, LLC

Dated: December 18, 2023

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties through their counsel of record, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: none.

Respectfully Submitted,

FISHER & PHILLIPS LLP

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